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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Cheryl Sagataw, DeAnthony  
Barnes, Roberta Strong, and  
Travis Neloms, *on behalf of  
themselves and a class of similarly  
situated individuals,*

Ct. File No. 24-cv-00001(ECF/TNL)

Plaintiffs,

DECLARATION OF ASHLEY  
JENSEN

v.

Mayor Jacob Frey, *in his individual and  
official capacity.*

Defendant.

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Your Declarant is Ashley Jensen, and she submits the following declaration:

1. I live in a four-unit residential building next door to the encampment located at 1100 East 28<sup>th</sup> Street in Minneapolis (“the Encampment”). I am also the property manager of the building in which I reside. The information in this declaration is based on my personal knowledge from first-hand involvement and/or information I’ve learned from conversations with others that live in my building.

2. Since this Encampment was started in early February 2024, there has

been a significant negative impact myself and others that live in my building.

3. Individuals from the Encampment frequently climb over the fence surrounding my property and come into my yard.

4. Once inside my fenced in property, individuals from the Encampment frequently urinate and defecate on my property.

5. Individuals from the Encampment frequently deposit soiled toilet paper in my yard.

6. Individuals from the Encampment frequently dispose of used hypodermic needles on and around my property.

7. Individuals from the Encampment frequently leave food waste and other garbage on my property.

8. Individuals from the Encampment frequently come onto my property and dig through my trash and recycling receptables. Recently, individuals from the Encampment came onto my property and stole my trash receptacle.

9. An individual from the Encampment was sleeping under the deck on my property for a period of several days in mid-February. On February 13, 2024, that individual started a fire, which then caused damage to the side of my property. A photograph of the damage from the fire is attached as Exhibit A to this declaration.

10. Individuals from the Encampment frequently congregate in my

building's private parking lot during the overnight hours. I am frequently awakened in the middle of the night to the sounds of individuals from the Encampment yelling and arguing loudly in my building's private parking lot.

11. On at least one occasion, individuals from the Encampment started a fire in my building's parking lot right next to my car.

12. The multiple, continuous campfires at the Encampment generate an extremely large amount of smoke. The smoke from the Encampment has infiltrated my residence, and there is now a near constant presence of campfire smoke inside of my building.

13. The campfire smoke from the Encampment that is now continuously in my residence is not only unpleasant, but it has negatively impacted my health and the health of my sister, who lives with me. The constant smoke exposure has caused me to have an ongoing sore throat. For my sister, who suffers from asthma, the exposure to the Encampment smoke has caused her to have a chronic cough and significant physical discomfort on a near constant, ongoing basis.

14. On February 29, 2024, there was a massive fire at the Encampment. A photograph of the fire and how close it was to my house is attached to this declaration as Exhibit B.

15. The February 29, 2024 fire caused serious property damage to the side of my house, melting my siding. A photograph of the damage is attached as

Exhibit C to this declaration.

16. I declare under penalty of perjury that everything I have stated in this declaration is true and correct. Signed in Hennepin County, Minnesota.

Dated: 2/29/24

/s/ Ashley Jensen  
Ashley Jensen